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Attorneys for Plaintiffs
Tele Atlas N.V. and Tele Atlas North America

E-FILED - 5/10/07

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

TELE ATLAS N.V. and TELE ATLAS
NORTH AMERICA,

Plaintiffs,

v.

NAVTEQ CORPORATION,

Defendant.

CASE NO. C 05-1673 RMW

**STIPULATION AND []
ORDER TO MODIFY CERTAIN
DEADLINES RELATED TO FACT
DISCOVERY**

Complaint filed April 22, 2005

The Honorable Ronald M. Whyte

STIPULATION

Subject to the approval of this Court, the parties hereby stipulate to the following modification of deadlines related to fact discovery and motions to compel fact discovery.

WHEREAS, the Order entered by this Court on January 22, 2007 set the fact discovery cut-off to be May 1, 2007;

WHEREAS, Tele Atlas N.V. and Tele Atlas North America ("Tele Atlas") served its Second Set of Requests for Production of Documents and Things, First Set of Interrogatories, and First Set of Requests for Admission on Defendant NAVTEQ Corporation ("NAVTEQ") on March 30, 2007;

WHEREAS, NAVTEQ requested an extension for serving written responses to the above-referenced discovery requests from April 30, 2007 to May 4, 2007;

WHEREAS, Tele Atlas agrees to such an extension provided that Tele Atlas' deadline to move to compel with respect to the above-referenced discovery be extended from May 10, 2007, as provided by Civil Local Rule 26-2, to May 14, 2007;

WHEREAS, each party is preparing a "privilege log" describing documents with respect to which it is asserting the attorney-client privilege, work product privilege, or other applicable privilege;

WHEREAS, the parties agree that such privilege logs shall be exchanged on May 15, 2007, and that each party shall have until May 24, 2007 to file and serve any motion regarding any dispute with respect to the assertion of privilege by the other party;

Accordingly, IT IS HEREBY STIPULATED by and between Tele Atlas and NAVTEQ, through their respective counsel of record, as follows:

1. NAVTEQ shall serve its written responses to Tele Atlas' Second Set of Requests for Production of Documents and Things, First Set of Interrogatories, and First Set of Requests for Admission on or before May 4, 2007;

2. Tele Atlas shall file and serve any motions to compel with respect to NAVTEQ's responses to Tele Atlas' Second Set of Requests for Production of Documents and Things, First Set of Interrogatories, and First Set of Requests for Admission on or before May 14, 2007;

1 3. Each party shall file and serve any motions regarding any disputes with respect to
2 the assertion of privilege by the other party on or before May 24, 2007.

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5 DATED: May 1, 2007

QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP

6
7 By /s/ Melissa J. Bailly

8 Melissa J. Bailly

9 Attorneys for Plaintiffs

Tele Atlas N.V. and Tele Atlas North America

10
11 DATED: May 1, 2007

WINSTON & STRAWN LLP

12
13 By /s/ David Koropp

14 David Koropp

15 Attorneys for Defendant

NAVTEQ Corporation

16
17
18 **Order**

19 PURSUANT TO STIPULATION, IT IS SO ORDERED:

20 Dated: 5/10/07

Ronald M. Whyte

21 United States District Court Judge